

REED SMITH LLP
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REED SMITH LLP
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Three Logan Square, Suite 3100
Philadelphia, PA 19103
Telephone: (215) 851-8100
Facsimile: (215) 851-1420
E-mail: tlaw@reedsmith.com
Special Insurance Counsel for Debtor
and Debtor in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

THE ROMAN CATHOLIC DIOCESE OF
ROCKVILLE CENTRE, NEW YORK,¹

Debtor.

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:

Chapter 11

Case No. 20-12345 (MG)

AMENDED AND RESTATED THIRTY-EIGHTH MONTHLY STATEMENT OF REED
SMITH LLP, AS SPECIAL INSURANCE COUNSEL FOR THE DEBTOR AND DEBTOR IN
POSSESSION, OF FEES FOR PROFESSIONAL SERVICES RENDERED AND
DISBURSEMENTS INCURRED FOR THE PERIOD
NOVEMBER 1, 2023 THROUGH NOVEMBER 30, 2023

Name of Applicant:	Reed Smith LLP
Authorized to Provide Professional Services to:	Debtor and Debtor in Possession
Date of Retention:	Order entered on November 4, 2020, <i>nunc pro tunc</i> to October 1, 2020
Period for which compensation and reimbursement is sought:	November 1, 2023 to November 30, 2023
Amount of Compensation sought as actual, reasonable and necessary:	\$233,935.00

¹ The Debtor in this chapter 11 case is The Roman Catholic Diocese of Rockville Centre, New York, the last four digits of its federal tax identification number are 7437, and its mailing address is 50 North Park Avenue P.O. Box 9023, Rockville Centre, NY 11571-9023.

	50% of which is \$116,967.50 ²
Amount of Expense Reimbursement sought as actual, reasonable and necessary:	\$12,124.97
Fees and Expenses of Debtor's Consulting Expert ("Expert F&E")	\$29,472.50 ³
TOTAL (50% of fees, 100% of costs, 100% of Expert F&E)	\$158,564.97

Reed Smith LLP ("Reed Smith"), as Special Insurance Counsel for the Debtor and Debtor-In Possession, hereby submits this thirty-eighth monthly statement (the "Monthly Statement") for the period of November 1, 2023 through November 30, 2023 (the "Statement Period") for payment of professional services rendered and reimbursement of expenses incurred during the Statement Period pursuant to the Court's Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Dkt. No. 129] (the "Fee Procedures Order"). Reed Smith requests: (a) interim allowance and payment of compensation in the amount of \$116,967.50 (50% of \$233,935.00) of fees on account of reasonable and necessary professional services rendered to the Debtor by Reed Smith, (b) reimbursement of actual and necessary costs and expenses in the amount of \$12,124.97 incurred by Reed Smith during the Statement Period, and (c) reimbursement for services rendered, and costs and expenses incurred, by Debtor's consulting expert in the amount of \$29,472.50.

FEES FOR SERVICES RENDERED DURING THE STATEMENT PERIOD

1. Set forth below is a list of the positions of the Reed Smith professionals and paraprofessionals who provided services to the Debtor during the Statement Period, their respective

² Per Order Dated December 19, 2023 Regarding Holdback on Professional Fees (Dkt. No. 2743).

³ Submitted for payment pursuant to *Order Authorizing the Retention of Experts* [Dkt. No. 783], ¶ 3.

billing rates, and the aggregate hours spent by each professional and paraprofessional in providing services on behalf of the Debtor during the Statement Period.

Name	Title	Department	Office	JD Year	Rate	Hours	Amount
Law, Timothy	Equity Partner	Litigation	Philadelphia	1995	1,250	21.8	\$ 27,250.00
Javian, Aaron	Fix.Sh.Partner	Business and Finance	New York	2004	1,215	5.0	\$ 6,075.00
Kramer, Ann	Fix.Sh.Partner	Litigation	New York	1984	1,390	32.7	\$ 45,453.00
Berringer, John	Counsel	Litigation	New York	1980	1,285	57.6	\$ 74,016.00
Kim, Esther Y.	Associate	Litigation	Philadelphia	2018	343	5.2	\$ 1,781.00
Kim, Esther Y.	Associate	Litigation	Philadelphia	2018	685	65.4	\$ 44,799.00
LauKamg, Christopher	Paralegal	Business and Finance	New York	-	410	29.8	\$ 12,218.00
Simmonds, Lianna E.	Paralegal	Litigation	Philadelphia	-	330	6.7	\$ 2,211.00
Zygmund-Felt, Georgia A.	Paralegal	Litigation	Philadelphia	-	380	6.4	\$ 2,432.00
Schad, James	Other	Litigation	Washington	-	600	29.5	\$ 17,700.00
						260.1	\$ 233,935.00
Total:							260.1 \$ 233,935.00

2. The rates charged by Reed Smith for services rendered to the Debtor are the same rates that it charges generally for professional services rendered to its non-bankruptcy clients as described in the engagement letter between Reed Smith and the Debtor. A complete itemization of tasks performed by these professionals and paraprofessionals for the Statement Period is annexed hereto as **Exhibit A.**

EXPENSES INCURRED DURING THE STATEMENT PERIOD

3. Set forth below is a categorical list of expenses incurred by Reed Smith during the Statement Period in the course of representing the Debtor.

Description	Amount
Duplicating/Printing/Scanning	\$ 76.90
Gravity Stack LLC November 2023 Invoice	\$ 10,699.60
Postage Expense	\$ 9.87
Monsignor Alan Placa Deposition Transcript Expense	\$ 1,338.60
TOTAL:	\$ 12,124.97

NOTICE AND OBJECTION PROCEDURES

4. Reed Smith has provided notice of this statement upon the following parties by electronic or first class mail: (i) the Debtor, the Roman Catholic Diocese of Rockville Centre, 50 N. Park Avenue, P.O. Box 9023, Rockville Centre, NY 11571 (Attn: Thomas Renker); (ii) counsel to the Debtor, Jones Day, 250 Vesey Street, New York, NY 10281 (Attn: Corinne Ball, Esq., Benjamin Rosenblum, Esq. and Andrew M. Butler, Esq.); (iii) the Office of the United States Trustee Region 2, Alexander Hamilton Custom House, One Bowling Green, Suite 534, New York, NY 10004 (Attn: Greg Zipes, Esq. and Shara Cornell, Esq.); and (iv) counsel for the Official Committee of Unsecured Creditors, Pachulski Stang Ziehl & Jones LLP, 780 Third Avenue, 34th Floor, New York, NY 10017 (Attn: Ilan D. Scharf, Esq., Karen B. Dine, Esq. and Brittany M. Michael, Esq.) and Pachulski Stang Ziehl & Jones LLP, 10100 Santa Monica Blvd., 13th Floor, Los Angeles, CA 90067 (Attn: James I. Stang, Esq.).

5. Pursuant to the Fee Procedures Order, objections to this Monthly Statement, if any, must be served no later than January 8, 2024 (the “Objection Deadline”) upon the following parties: (i) the Debtor, the Roman Catholic Diocese of Rockville Centre, 50 N. Park Avenue, P.O. Box 9023, Rockville Centre, NY 11571 (Attn: Thomas Renker); (ii) counsel to the Debtor, Jones Day, 250 Vesey Street, New York, NY 10281 (Attn: Corinne Ball, Esq., Benjamin Rosenblum, Esq. and Andrew M. Butler, Esq.); (iii) the Office of the United States Trustee Region 2, Alexander Hamilton Custom House, One Bowling Green, Suite 534, New York, NY 10004 (Attn: Greg Zipes, Esq. and Shara Cornell, Esq.); (iv) counsel for the Official Committee of Unsecured Creditors, Pachulski Stang Ziehl & Jones LLP, 780 Third Avenue, 34th Floor, New York, NY 10017 (Attn: Ilan D. Scharf, Esq., Karen B. Dine, Esq. and Brittany M. Michael, Esq.) and Pachulski Stang Ziehl & Jones LLP, 10100 Santa Monica Blvd., 13th Floor, Los Angeles, CA 90067 (Attn: James I. Stang, Esq.); and (v)

Special Insurance Counsel, Reed Smith LLP, 599 Lexington Avenue, New York, NY 10022 (Attn: Aaron Javian, Esq. and John B. Berringer, Esq.) and Reed Smith LLP, 1717 Arch Street, Three Logan Square, Suite 3100, Philadelphia, PA 19103 (Attn: Timothy P. Law, Esq.).

6. If no objections to this Monthly Statement are received by the Objection Deadline, the Debtor will be authorized thereafter to pay Reed Smith 50% of the fees and 100% of the expenses identified in the Monthly Statement as well as 100% of the Expert F&E.

7. To the extent an objection to the Monthly Statement is received on or before the Objection Deadline, the Debtor will withhold payment of that portion of the Monthly Statement to which the objection is directed and is authorized to pay the remainder of fees and expenses in the percentages set forth above. To the extent such objection is not resolved, it shall be preserved and presented to the Court at the next interim or final fee application hearing to be heard in accordance with paragraph 2(k) of the Fee Procedures Order.

Dated: December 22, 2023
New York, New York

REED SMITH LLP

/s/ Aaron Javian
Aaron Javian, Esq.
John B. Berringer, Esq.
599 Lexington Avenue
New York, NY 10022
Telephone: (212) 521-5400
Facsimile: (212) 521-5450
E-mail: ajavian@reedsmith.com
E-mail: jberringer@reedsmith.com

-and-

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*Special Insurance Counsel for Debtor and
Debtor in Possession*

EXHIBIT A



Reed Smith LLP
599 Lexington Avenue
22nd Floor
New York, NY 10022
Telephone: +1 215 851 8100
Fax: +1 215 851 1420
Tax ID # 25-0749630

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R.C. Diocese of Rockville Centre
50 No. Park Avenue
Att: William G. Chapin
Rockville Centre, NY 11570
US - UNITED STATES

Invoice Number: **3681067**
Invoice Date: **12/8/2023**
Client Number: **504893**
Matter Number: **504893.20001**

REMITTANCE PAGE
PLEASE RETURN THIS COPY WITH YOUR PAYMENT

RE: Non-Working Travel

Total Current Fees.....\$ 1,781.00

Total Due This Invoice: \$ 1,781.00

Please Remit to:

Mail To:
Reed Smith LLP
Lockbox 10096
PO BOX 70280
Philadelphia, PA 19176-0280

Wire Instructions:
BNY Mellon Bank N.A.
Philadelphia, PA
ABA Number: 031000037
Swift Code: IRVTUS3N (International)
Account #2-022-986
(Please Reference Invoice Number)



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Invoice Date: **12/8/2023**
Client Number: **504893**
Matter Number: **504893.20001**

RE: Non-Working Travel

INVOICE SUMMARY

Total Current Fees.....	\$ 1,781.00
Total Due This Invoice:	\$ <u>1,781.00</u>

Please Remit to:

Mail To:
Reed Smith LLP
Lockbox 10096
PO BOX 70280
Philadelphia, PA 19176-0280

Wire Instructions:
BNY Mellon Bank N.A.
Philadelphia, PA
ABA Number: 031000037
Swift Code: IRVTUS3N (International)
Account #2-022-986
(Please Reference Invoice Number)



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50 No. Park Avenue
Att: William G. Chapin
Rockville Centre, NY 11570
US - UNITED STATES

Invoice Number: **3681067**
Invoice Date: **12/8/2023**
Client Number: **504893**
Matter Number: **504893.20001**

DETAIL FOR PROFESSIONAL SERVICES RENDERED THROUGH November 30, 2023

Date	Timekeeper	Description	Hours
11/15/23	E. Y. Kim	Travel to Babylon, NY from Philadelphia, PA for file review at W. Chapin's office.	2.40
11/16/23	E. Y. Kim	Return travel from Babylon, NY to Philadelphia, PA for file review at W. Chapin's office.	2.80
Total Hours			5.20

SUMMARY OF PROFESSIONAL SERVICES:

Timekeeper	Hours	Rate	Total
Esther Y. Kim	5.20 hrs @ \$	342.50 / hr	1,781.00
Total Professional Services			1,781.00

INVOICE SUMMARY

Total Fees \$ 1,781.00

TOTAL CURRENT INVOICE DUE \$ **1,781.00**

Total Amount Due \$ **1,781.00**



Reed Smith LLP
Three Logan Square
Suite 3100
1717 Arch Street
Philadelphia, PA 19103
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R.C. Diocese of Rockville Centre
50 No. Park Avenue
Att: William G. Chapin
Rockville Centre, NY 11570
US - UNITED STATES

Invoice Number: **3681064**
Invoice Date: **12/8/2023**
Client Number: **504893**
Matter Number: **504893.60005**

REMITTANCE PAGE
PLEASE RETURN THIS COPY WITH YOUR PAYMENT

RE: Chapter 11 Insurance Recovery

Total Current Fees.....	\$	218,937.00
Total Current Expenses and Other Charges	\$	<u>12,124.97</u>
Total Due This Invoice:	\$	<u>231,061.97</u>

Please Remit to:

Mail To:
Reed Smith LLP
P.O. Box 360110
Pittsburgh, PA 15251-6110

Wire Instructions:
BNY Mellon Bank N.A.
Philadelphia, PA
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Total Due This Invoice:	\$ <u>231,061.97</u>

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Client Number: **504893**
Matter Number: **504893.60005**

DETAIL FOR PROFESSIONAL SERVICES RENDERED THROUGH November 30, 2023

Date	Timekeeper	Description	Hours
11/01/23	A. Kramer	Work in Process call with JD, RS and A&M teams (.50); attend J. Glenn hearing (1.0).	1.50
11/01/23	T.P. Law	Participate in work in process call.	0.70
11/01/23	J.B. Berringer	Preparation for and attendance on teleconference (.60); attendance on Zoom hearing (.60).	1.20
11/02/23	J.B. Berringer	Review new docs from W. Chapin re: old claims (.50); emails with W. Chapin, E. Kim re: same (.40); preparation for Arrowood corporate dep. (.90); emails T. Law, E. Kim re: same (.30); review emails re: underlying case (.40); email JD re: same (.10).	2.60
11/02/23	E. Y. Kim	Analyze Arrowood claim correspondence and policies to draft 30(b)(6) deposition outline.	3.10
11/03/23	J.B. Berringer	Telephone conference with W. Chapin re: LMI discovery (.60); review docs from Chapin re: Abuse claims (1.1); emails E. Kim, T. Law re: Arrowood 30(b)(6) deposition (.50).	2.20
11/03/23	J.C. Schad	Identify, notate, transfer insurer letters re: coverage pursuant to requests from E. Kim.	1.60
11/06/23	J.B. Berringer	Review draft 30(b)(6) Notice , email E. Kim re: same (.20); review new docs from client, email E. Kim, T. Law re: same (.90); review email from Network Adjustors, emails T. Law, W. Chapin re: same (.40); 30(b)(6) arrangements (.50).	2.00
11/06/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and	0.80



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Date	Timekeeper	Description	Hours
		calendar.	
11/06/23	T.P. Law	Email exchange with Reed Smith team re: discovery and adversary proceedings.	0.30
11/06/23	E. Y. Kim	Draft and finalize Amended Arrowood 30(b)(6) deposition notice (.60); analyze Risx-Facs documents for production to LMI (1.8); analyze Arrowood production to draft 30(b)(6) deposition outline (2.7).	5.10
11/07/23	G. A. Zygmund-Felt	Data entry and analysis re: discovery and date of earliest notice.	3.50
11/07/23	G. A. Zygmund-Felt	Data entry and analysis re: discovery and date of earliest notice.	1.90
11/07/23	J.B. Berringer	Review 30(b)(6) Topics for t/c E. Kim (.80); t/c T. Law, E. Kim re: Arrowood deposition (.60); review emails re: Sisters of Mercy (.40); emails client re: same (.30).	2.10
11/07/23	T.P. Law	Telephone conference with Reed Smith team re: Arrowood deposition strategy.	0.40
11/07/23	T.P. Law	Telephone conference with B. Chapin re: [REDACTED].	0.40
11/07/23	J.C. Schad	Analyze, prepare report to E. Kim re: noticed suits without insurer responses; correlative analysis re: insurers' coverage position letters (1.1); prepare reports to E. Kim re: additional insurer letters (4.3); analyze, prepare summary re: certain wordings in Royal policies (1.8); prepare reports to E. Kim (.20).	7.40
11/07/23	L. E. Simmonds	Analyze all Arrowood Correspondence to begin and prepare same for document production.	2.90
11/07/23	E. Y. Kim	Analyze Arrowood production, correspondence and policies to draft 30(b)(6) deposition outline (5.8); analyze Arrowood policies and documents in Arrowood's production for review by J. Berringer (.50); call with T. Law and J. Berringer regarding strategy for same (.60); communications with J. Schad regarding	7.70



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Date	Timekeeper	Description	Hours
		Arrowood policy provisions and claim correspondence for same (.50); communications with L. Simmonds regarding Arrowood claim correspondence for same (.30).	
11/08/23	T.P. Law	Participate in work in process call.	0.80
11/08/23	T.P. Law	Address impact of liquidation of Arrowood.	2.20
11/08/23	G. A. Zygmund-Felt	Data entry and analysis re: discovery and date of earliest notice.	1.00
11/08/23	J.B. Berringer	Review deposition Outline (.60); review docs from client re: pre-CVA claims with LMI (.90); emails E. Kim, T. Law re: same (.30); review email from Network Adjustors, emails T. Law, W. Chapin re: same (.60); arrangements for Arrowood deposition (.80); review policies, notice letters for Arrowood dep. (.80); review Arrowood Insolvency order, t/c A. Smith re: same (.90).	4.90
11/08/23	J.C. Schad	Attention to historic primary policy terms for report to J. Berringer (1.2); correlate, notate, prepare supporting materials for report to E. Kim (2.7); prepare register of policy wordings for report to J. Berringer, E. Kim (1.3); attention to notice of insolvency of historic insurer (1.0).	6.20
11/08/23	L. E. Simmonds	Complete analysis all Arrowood Correspondence to begin and prepare same for document production including de-duping. Analyze and de-dupe all Coverage Position Letters re CVA Suits for document production.	3.80
11/08/23	E. Y. Kim	Analyze Arrowood policies and claim correspondence to draft 30(b)(6) outline (4.8); email T. Law and J. Berringer regarding same (.10); analyze policies and claim correspondence regarding exhibits for same (2.5).	7.40
11/08/23	A. Kramer	Work in process call with client, A&M, JD and RS teams re: bankruptcy and Steinman developments (.60); address Arrowood liquidation order with client, KCIC, JD and RS teams (2.70).	3.30
11/09/23	E. Y. Kim	Analyze documents from client and claim files	2.60



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Date	Timekeeper	Description	Hours
		from Network Adjusters for supplemental production to LMI.	
11/09/23	T.P. Law	Telephone conference with B, Chapin and J. Berringer re: billing defense costs to Arrowood and LMI.	0.40
11/09/23	T.P. Law	Telephone conference with Jones Day re: various insurance issues for potential plan.	0.40
11/09/23	T.P. Law	Review and approve Jones Day re: [REDACTED].	0.30
11/09/23	T.P. Law	Emails to Jones Day re: [REDACTED].	1.40
11/09/23	J.B. Berringer	Telephone conference with client, T. Law re: status, billing issues (.60); t/c Jones Day, T. Law re: Arrowood insolvency (.60); review Insolvency Order, articles and emails re: Arrowood (2.0).	3.20
11/09/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
11/09/23	A. Kramer	E-mail exchange with JD and RS teams re: message from mediators (.20); follow up with Berringer re: call with JD team re: Arrowood issues (.10).	0.30
11/10/23	E. Y. Kim	Analyze documents from client and claim files from Network Adjusters for supplemental production to LMI (2.7); communications with J. Berringer regarding LMI subpoenas and depositions (.40).	3.10
11/10/23	T.P. Law	Emails with Jones Day re: executing the Arrowood liquidation order to stay underlying litigation.	1.20
11/10/23	J.B. Berringer	Emails E. Kim re: LMI subpoenas (.40); emails T. Geremia, team re: Arrowood stay (.80); emails A. Smith re: Ct. Order, meet & confer (.60); emails team re: Arrowood Order (.40); emails re: Arrowoods Network Adjustors subpoena (.40).	2.60
11/10/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY	0.80



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Date	Timekeeper	Description	Hours
		adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	
11/10/23	A. Kramer	Email exchanges with JD and RS teams re: Arrowood liquidation order.	0.40
11/13/23	J.B. Berringer	Review emails re: Network Adjustors subpoena (.60); t/c T. Law re: same (.20); review email re: NA mtg. w/ LMI, t/c T. Law re: same , email NA re: same (.70); review emails from E. Kim, J. Moffitt re: LMI discovery (.50); arrangements for Meet & Confer with Arrowood, including email to Committee Counsel, t/cs T. Law, A. Kramer re: same (.70); emails to A. Smith re: same (.50); review Allianz, LMI objection to Plan in Diocese of Camden reorg (1.1).	4.30
11/13/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
11/13/23	A. Kramer	Review insurer objection filing in Camden Ch.11.	1.20
11/13/23	T.P. Law	Draft redlined comments to state court counsel re: Arrowood stay of underlying actions and transmit to Jones Day.	1.10
11/14/23	J.B. Berringer	Telephone conference with Arrowood counsel re: letter to Judge Cave (.50); t/cs T. Law, A. Kramer re: same (.30); email A. Kramer re: same (.20); t/c W. Chapin, Network Adjustors re: subpoena, docs (.80); email E. Kim re: same (.20); review of docs from Chapin (.80).	2.80
11/14/23	A. Kramer	Telephone conversation with J. Berringer re: Arrowood call (.20); team call with mediators and JD team (.70).	0.90
11/14/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
11/14/23	T.P. Law	Telephone conference with Arrowood counsel re:	0.40



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Date	Timekeeper	Description	Hours
		impact of liquidation.	
11/14/23	T.P. Law	Telephone conference with Network Adjusters and B, Chapin re: claim handling issues.	0.50
11/15/23	E. Y. Kim	Call with T. Law, J. Berringer regarding strategy for LMI supplemental discovery responses (.80); call and emails with W. Chapin regarding LMI interrogatory responses (.40); analyze claim correspondence and documents to produce to LMI (1.5); revise LMI supplemental discovery responses and analyze documents regarding same (2.9).	5.60
11/15/23	A. Kramer	Telephone conversations with J. Berringer and T. Law re: call with mediators (.40); telephone conversation with C. Sugayan re: mediation/settlement, dismissal etc. (.60); draft note to RS and JD teams re: same (.40); review/comment on draft letter to J. Cave re: Arrowood coverage case (.30).	1.70
11/15/23	J.C. Schad	Discussion with E. Kim re: onsite investigations, prior discovery, responses to LMI, potentially responsive materials (.80); attention to materials potentially responsive to LMI discovery requests (2.6); discussion with J. Berringer re: relevance of testimony, materials responsive to LMI discovery requests (.20); review, notate, record materials re: discovery (1.2).	4.80
11/15/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
11/15/23	J.B. Berringer	Review LMI 30(b)(6) notice, email to W. Chapin re: same (.60); t/c A. Kramer re: mediation session (.30); prep. for, attendance on t/c with E. Kim, T. Law re: Supp. responses to LMI discovery (.90); revisions to draft letter to Court re: Arrowood insolvency, email T. Law re: same (.60); revisions to LMI discovery responses (1.10); review emails re: LMI settlement	4.90



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Date	Timekeeper	Description	Hours
		discussions (.40); review Schad, Adams emails re: LMI discovery (.40); t/cs Chapin, Kim re: doc. review for LMI production (.60).	
11/15/23	T.P. Law	Telephone conference with A. Kramer re: call with mediators and next steps.	0.30
11/15/23	T.P. Law	Draft changes to Arrowood's proposed letter to Judge Cave.	1.20
11/15/23	T.P. Law	Telephone conference with J. Berringer and E. Kim re: supplemental responses to LMI discovery request.	0.60
11/16/23	E. Y. Kim	Analyze files at W. Chapin's office and LMI claim correspondence for potential documents to produce to LMI (3.7); revise supplemental responses to LMI's interrogatories and document requests per T. Law and J. Berringer's comments (1.6).	5.30
11/16/23	A. Kramer	Review/analyze/comment/revise Plan draft (7.2); email exchanges with Law and Berringer re: same (.20); email exchanges with JD and RS teams re: response to Slater letter (.30).	7.70
11/16/23	J.C. Schad	Analyze, prepare response to request from E. Kim re: claims against LMI for CVA suits (1.2); analyze, notate, record materials from Network Adjusters re: historic LMI coverage for WC matters (2.6).	3.80
11/16/23	J.B. Berringer	Review, revise Supplemental Responses to LMI discovery demands (2.1); emails E. Kim, A. Kramer, T. Law re: same (.50) review of new draft Plan, T. Law email re: same (.90); emails Jones Day re: Supplemental Response to LMI Discovery demands (.40) t/c E. Kim re: same (.30); t/c with Network Adjustors, LMI counsel re: claims handling (.50); review A. Kramer comments re: draft Plan, email Kramer re: same (.80); review draft letter to Judge Oetken, emails re: same (.60).	6.10
11/16/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY	0.80



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Date	Timekeeper	Description	Hours
		adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	
11/16/23	T.P. Law	Telephone conference with LMI and Network Adjusters re: claims handling issues and response to subpoena.	0.80
11/16/23	T.P. Law	Review and provide comments on letter to Judge Oetken re: whether omnibus appeals are stayed.	1.60
11/16/23	T.P. Law	Review potential Chapter 11 plan regarding insurance issues.	2.00
11/17/23	E. Y. Kim	Revise and finalize supplemental responses to LMI's interrogatories and document requests (.40); analyze claim documents for production regarding personal identifiable and health information (2.8); final review of document production to LMI and Evanston (1.1); draft redaction logs for supplemental productions to LMI and Evanston (.50); email opposing counsel regarding supplemental discovery responses and production (.10).	4.90
11/17/23	A. Kramer	Review/analyze/comment/revise Plan draft (6.3); conference call and email exchanges with T. Law and J. Berringer re: same (1.0).	7.30
11/17/23	J.C. Schad	Discussion with E. Kim re: LMI discovery requests (.40); analyze, notate, record materials potentially responsive to LMI discovery requests (2.8); review, revise materials for production to LMI (.20).	3.40
11/17/23	J.B. Berringer	Telephone conference with T. Law, A. Kramer re: draft Plan (.90); t/c T. Newman re: assignment of insurance rights issue (.30); review of briefs, Opinion re: same (.90); emails A. Kramer re: same (.30); legal research re same (2.5).	4.90
11/17/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80



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Date	Timekeeper	Description	Hours
11/17/23	T.P. Law	Telephone conference with A. Kramer and J. Berringer re: insurance issues in potential Chapter 11 plan.	1.00
11/18/23	J.B. Berringer	Further legal research re assignment of insurance rights, email A. Kramer re: same.	2.40
11/20/23	E. Y. Kim	Revise task list for discovery items for LMI and Evanston actions (.70); email T. Law, J. Berringer regarding same (.10); analyze LMI production and discovery responses regarding deficiencies (1.5).	2.30
11/20/23	J.B. Berringer	Review email from counsel re: subpoena, response to email(.30); arrangements for zoom appearance (.20); review emails, Committee re: test cases motion (.60); review emails re: LMI discovery (.50).	1.60
11/20/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
11/20/23	C.M. LauKamg	Arrange USBC SDNY November 28, 2023 Hearing Appearances and circulate confirmations to Attorneys.	0.60
11/20/23	A. Kramer	Review Committee's test case motion (.30); email exchange with Berringer and Law re: same (.10); communications with JD team re: LMI call (.10).	0.50
11/20/23	T.P. Law	Address LMI motion for extension of time.	0.30
11/21/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
11/21/23	C.M. LauKamg	Revise USBC SDNY November 28, 2023 Hearing Appearances and circulate confirmations of same.	0.40
11/21/23	A. Kramer	Review Committee corrected test case motion (.40); Team call with Rosenblum and Butler re: draft Plan (1.0); Team call with LMI and JD teams	2.60



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Date	Timekeeper	Description	Hours
		re: settlement (.70); communications with JD team re: test case motion (.50).	
11/21/23	J.B. Berringer	Telephone conferences with counsel, E. Kim re: LMI subpoena (.80); email to GB counsel, LMI attorney re: same (.40); review, reply to J. Moffitt email re: depositions (.40); review A. Kramer email re: Committee test cases motion (.20).	1.80
11/22/23	E. Y. Kim	Analyze subpoena documents regarding privilege.	1.20
11/22/23	A. Kramer	Work in process call with client, A&M, JD and RS teams re: committee motion, plan etc. (1.0); email exchange and conference call with E. Stephens and J. Terrell re: Committee motion (.30); email exchange re: hearing prep (.30).	1.60
11/22/23	T.P. Law	Start letters to Liquidation Bureau and Delaware regulator re: Arrowood liquidation and stay of litigation.	1.20
11/22/23	J.B. Berringer	Telephone conference with team (1.0); email A. Kramer re: test cases motion (.20); review emails re: scheduling issue (.20); review T. Law email, t/c T. Law re: Arrowood liquidation (.20).	1.60
11/22/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
11/27/23	A. Kramer	Work with JD Team re: message to court (.30); draft/revise message to insurers re: test case motions (.50).	0.80
11/27/23	J.B. Berringer	Review T. Geremia draft letters re: hearing (.30); review emails re: Zoom hearing (.40); review A. Kramer draft email to Insurers re: "test cases" motion, reply to A. Kramer re: same (.30).	1.00
11/27/23	C.M. LauKamg	Revise and arrange USBC SDNY November 28, 2023 Hearing Appearances and circulate confirmations of same.	0.60
11/27/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY	0.80



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Date	Timekeeper	Description	Hours
		adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	
11/28/23	A. Kramer	Attend status conference before J. Glenn via Zoom.	1.40
11/28/23	J.B. Berringer	Preparation for, attendance on Zoom hearing.	1.40
11/28/23	C.M. LauKamg	Retrieve USBC SDNY docket for pleadings in preparation for the November 28, 2023 Hearing and circulate same to Attorneys.	0.80
11/29/23	E. Y. Kim	Analyze documents to draft preparation outline for LMI deposition of W. Chapin.	3.40
11/29/23	A. Kramer	Work in Process call with JD, A&M and RS team re: hearing, Plan, Committee motion etc. (1.0); team call with KCIC re: Declaration (.50).	1.50
11/29/23	E. Y. Kim	Draft preliminary outline of LMI 30(b)(6) deposition (3.1); analyze claims handling procedures regarding Network Adjusters (.80); analyze subpoena documents regarding privilege (1.4).	5.30
11/29/23	T.P. Law	Participate in work in process call with Jones Day and Reed Smith teams.	1.00
11/29/23	J.C. Schad	Analyze, prepare report to E. Kim re: historic LMI coverage (.40); analyze, review prior work product re: Arrowood coverage letters for reports to J. Berringer (.80).	1.20
11/29/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
11/29/23	J.B. Berringer	Team conference call (1.0); review E. Kim emails re: deposition prep, document production (.40); reply to Kim emails (.30); review J. Nador email re: Ecclesia, email J. Schad re: same (.30).	2.00
11/30/23	E. Y. Kim	Analyze documents to draft preparation outline for LMI deposition of W. Chapin.	3.80



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Date	Timekeeper	Description	Hours
11/30/23	E. Y. Kim	Analyze claims handling procedures relating to Network Adjusters for production (.90); analyze subpoena documents regarding privilege (1.5); draft preliminary outline of LMI 30(b)(6) deposition and analyze documents for same (2.2).	4.60
11/30/23	T.P. Law	Telephone conference with [REDACTED].	0.60
11/30/23	T.P. Law	Review and approve joint request for extension of deadlines in LMI matter.	0.30
11/30/23	J.C. Schad	Participate in call with J. Berringer re: Ecclesia policy materials (.30); prepare reports with Ecclesia documents for J. Berringer (.50); review policy terms (.30).	1.10
11/30/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
11/30/23	J.B. Berringer	Review Nador, Schad emails re: Ecclesia (.40); t/cs Schad. W. Chapin re: same (.40); email Nador re: same (.30); review Moffitt email, email T. Law re: same (.40); review E. Kim, T. Law emails re: LMI deps, doc. production (.50).	2.00
Total Hours			233.30

SUMMARY OF PROFESSIONAL SERVICES:

Timekeeper	Hours	Rate	Total
Ann V. Kramer	32.70 hrs @ \$	1,390.00 / hr	45,453.00
John B. Berringer	57.60 hrs @ \$	1,285.00 / hr	74,016.00
Timothy P. Law	21.40 hrs @ \$	1,250.00 / hr	26,750.00
Esther Y. Kim	65.40 hrs @ \$	685.00 / hr	44,799.00
James C. Schad	29.50 hrs @ \$	600.00 / hr	17,700.00
Christopher LauKamg	13.60 hrs @ \$	410.00 / hr	5,576.00



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Timekeeper	Hours	Rate	Total
Georgia A. Zygmund-Felt	6.40 hrs @ \$	380.00 / hr	2,432.00
Lianna E. Simmonds	6.70 hrs @ \$	330.00 / hr	2,211.00
Total Professional Services			218,937.00

DISBURSEMENTS AND OTHER CHARGES

Date	Description	Amount
	Duplicating/Printing/Scanning	769.00 @ 0.10 76.90
	Postage Expense	9.87
10/17/2023	Monsignor Alan Placa Deposition Transcript Expense	1,338.60
11/29/2023	Gravity Stack LLC November 2023 Invoice	10,699.60
Total Expenses and Other Charges		12,124.97

INVOICE SUMMARY

Total Fees	\$ 218,937.00
Total Expenses and Other Charges	\$ 12,124.97
TOTAL CURRENT INVOICE DUE	\$ 231,061.97
Total Amount Due	\$ 231,061.97



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R.C. Diocese of Rockville Centre
50 No. Park Avenue
Att: William G. Chapin
Rockville Centre, NY 11570
US - UNITED STATES

Invoice Number: **3681074**
Invoice Date: **12/8/2023**
Client Number: **504893**
Matter Number: **504893.60006**

REMITTANCE PAGE
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RE: Fee statements/fee applications

Total Current Fees.....\$ 13,217.00

Total Due This Invoice: \$ 13,217.00

Please Remit to:

Mail To:
Reed Smith LLP
Lockbox 10096
PO BOX 70280
Philadelphia, PA 19176-0280

Wire Instructions:
BNY Mellon Bank N.A.
Philadelphia, PA
ABA Number: 031000037
Swift Code: IRVTUS3N (International)
Account #2-022-986
(Please Reference Invoice Number)



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R.C. Diocese of Rockville Centre
50 No. Park Avenue
Att: William G. Chapin
Rockville Centre, NY 11570
US - UNITED STATES

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Client Number: **504893**
Matter Number: **504893.60006**

RE: Fee statements/fee applications

INVOICE SUMMARY

Total Current Fees.....	\$ 13,217.00
Total Due This Invoice:	\$ <u>13,217.00</u>

Please Remit to:

Mail To:
Reed Smith LLP
Lockbox 10096
PO BOX 70280
Philadelphia, PA 19176-0280

Wire Instructions:
BNY Mellon Bank N.A.
Philadelphia, PA
ABA Number: 031000037
Swift Code: IRVTUS3N (International)
Account #2-022-986
(Please Reference Invoice Number)



Reed Smith LLP
599 Lexington Avenue
22nd Floor
New York, NY 10022
Telephone: +1 215 851 8100
Fax: +1 215 851 1420
Tax ID # 25-0749630

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MUNICH ♦ NEW YORK ♦ ORANGE COUNTY ♦ PARIS ♦ PHILADELPHIA ♦ PITTSBURGH ♦ PRINCETON ♦ RICHMOND ♦ SAN FRANCISCO ♦ SHANGHAI ♦ SILICON VALLEY ♦ SINGAPORE ♦ TYSONS ♦ WASHINGTON, D.C. ♦ WILMINGTON

R.C. Diocese of Rockville Centre
50 No. Park Avenue
Att: William G. Chapin
Rockville Centre, NY 11570
US - UNITED STATES

Invoice Number: **3681074**
Invoice Date: **12/8/2023**
Client Number: **504893**
Matter Number: **504893.60006**

DETAIL FOR PROFESSIONAL SERVICES RENDERED THROUGH November 30, 2023

Date	Timekeeper	Description	Hours
11/02/23	C.M. LauKamg	Finalize, electronically file and serve USBC SDNY Certificate of No Objection for the September 2023 Reed Smith LLP Monthly Fee Statement and update master files and calendar.	0.80
11/08/23	C.M. LauKamg	Prepare USBC SDNY Reed Smith LLP Thirty-Seventh Monthly Fee Statement in preparation for electronic filing.	1.60
11/09/23	C.M. LauKamg	Run Redline between Reed Smith LLP Eighth Interim Fee Application and Ninth Interim Fee Application and circulate same to A. Javian.	0.40
11/10/23	A. Javian	Review/comment on draft Interim Fee Application.	3.50
11/13/23	A. Javian	Finalize Interim Fee Application.	1.50
11/13/23	T.P. Law	Draft comments to Ninth Interim Fee Application.	0.40
11/13/23	C.M. LauKamg	Coordinate with Accounting Department regarding payment of KCIC September 2023 Invoice and arrange payment of same.	0.80
11/13/23	C.M. LauKamg	Run Redline between USBC SDNY Reed Smith LLP Eighth Interim Fee Application and Ninth Interim Fee Application and circulate same to A. Javian.	0.40
11/13/23	C.M. LauKamg	Review, revise and finalize USBC SDNY Reed Smith LLP Ninth Interim Fee Application in preparation for electronic filing.	1.80
11/14/23	C.M. LauKamg	Finalize, electronically file and coordinate service of USBC SDNY Reed Smith LLP Ninth Interim	1.40



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Date	Timekeeper	Description	Hours
		Fee Application and update master files and calendar.	
11/14/23	C.M. LauKamg	Finalize USBC SDNY Reed Smith LLP Ninth Interim Fee Application in preparation for electronic filing.	0.40
11/15/23	C.M. LauKamg	Revise USBC SDNY Reed Smith LLP Thirty-Seventh Monthly Fee Statement in preparation for electronic filing (1.5); coordinate with Accounting Department regarding payment status of the September 2023 KCIC Invoice (.8).	2.30
11/16/23	C.M. LauKamg	Review and finalize USBC SDNY Reed Smith LLP Thirty-Seventh Monthly Fee Statement in preparation for electronic filing.	0.80
11/17/23	C.M. LauKamg	Revise USBC SDNY Reed Smith LLP Thirty-Seventh Monthly Fee Statement in preparation for electronic filing.	1.00
11/21/23	C.M. LauKamg	Finalize USBC SDNY Reed Smith LLP Thirty-Seventh Monthly Fee Statement in preparation for electronic filing.	1.10
11/21/23	C.M. LauKamg	Review USBC SDNY Monthly Fee Statements in preparation for Fourth Quarter 2023 Fee Estimates and Totals.	1.00
11/21/23	C.M. LauKamg	Finalize, electronically file and coordinate service of USBC SDNY Reed Smith LLP Thirty-Seventh Monthly Fee Statement and update master files and calendar.	1.80
11/22/23	C.M. LauKamg	Follow up with Epiq regarding service of USBC SDNY Reed Smith LLP Thirty-Seventh Monthly Fee Statement.	0.20
11/28/23	C.M. LauKamg	Follow up with Epiq regarding status of Certificate of Service for USBC SDNY Reed Smith LLP Thirty-Seventh Monthly Fee Statement and update master files regarding same.	0.40
Total Hours			21.60



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SUMMARY OF PROFESSIONAL SERVICES:

Timekeeper	Hours	Rate	Total
Timothy P. Law	0.40 hrs @ \$	1,250.00 / hr	500.00
Aaron Javian	5.00 hrs @ \$	1,215.00 / hr	6,075.00
Christopher LauKamg	16.20 hrs @ \$	410.00 / hr	6,642.00
Total Professional Services			13,217.00

INVOICE SUMMARY

Total Fees \$ 13,217.00

TOTAL CURRENT INVOICE DUE \$ **13,217.00**

Total Amount Due \$ **13,217.00**